

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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**CONNOR NEECK**  
and **ISAIAH WEST**,  
individually and on behalf  
of all others similarly situated,

Plaintiffs,

Case No. 19-cv-834

vs.

**BADGER BROTHERS MOVING LLC**,

Defendant.

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**UNOPPOSED MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

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Plaintiffs and participating class members, by and through their undersigned counsel, hereby jointly move the Court for a final order approving the settlement of this class action as follows:

1. Finally approving the Settlement Agreement (Dkt. 21), adjudging its terms to be fair, reasonable, and adequate, and directing consummation of its terms and provisions;
2. Finally approving the enhancement payments of \$1,000.00 to Named Plaintiff Connor Neeck and \$1,000.00 to Named Plaintiff Isaiah West;
3. Finally approving Plaintiff's Unopposed Motion for Class Counsel's Costs and Attorneys' Fees, and awarding Class Counsel costs and attorneys' fees in the total amount of \$23,333.33;

4. Finally approving the settlement amounts to be paid to the participating settlement class members as detailed in dkt. 21 at 26;

5. Dismissing the Lawsuit and Plaintiffs' Complaint on the merits with prejudice, and barring and permanently enjoining, to the fullest extent of applicable law, Named Plaintiff and all class members (aside from those filing timely and valid requests for exclusion) from pursuing any claims that were released against Defendant, as set forth in Sections 5 and 6 of the Settlement Agreement.

For the reasons outlined in the memorandum of law filed herewith, Plaintiff believes the Settlement Agreement provides for a fair resolution of the disputes between the parties and respectfully requests that the Court grant final approval of the settlement.

Respectfully submitted this 5th day of May, 2021.

By: /s/Caitlin M. Madden  
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